

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GORDON ROY PARKER, :  
Plaintiff, :  
vs. : Civil Action  
LEARN THE SKILLS CORP., : Case No. 05-cv-2752  
ET AL. :  
Defendants. :  
-----

**OPPOSITION TO PLAINTIFF'S  
MOTION FOR RECONSIDERATION  
BY DEFENDANT MATTHEW S. WOLF, PRO SE, AND  
BY DEFENDANT LEARN THE SKILLS CORP.,  
THROUGH MATTHEW S. WOLF, ESQUIRE, AS COUNSEL**

I write as a pro-se defendant, as well as counsel for Learn the Skills Corp. ("LTSC").

With regard to the informality of this opposition, I ask that the Court waive any irregularity as to form. I have been mobilized and deployed with the United States Army in support of Operation Iraqi Freedom and I am filing this from Iraq. As such, shortly, I will no longer be representing LTSC but I am filing this opposition only so that LTSC's rights are not prejudiced while LTSC searches for new counsel. I expect to hear from their new counsel shortly.

It is clear that the Plaintiff has also filed an appeal with the Third Circuit Court of Appeals.

LTSC and I join in the opposition to the Plaintiff's motions filed by co-defendant Trustees of the University of Pennsylvania. Plaintiff has not satisfied any criteria to justify reconsideration. Additionally, I believe that the filing of the appeal may have caused the Plaintiff to lose his right to seek reconsideration since this matter is on appeal.

With regard to the specific bases alleged for reconsideration as to myself, Plaintiff continues to fixate on my hyperbole as a basis for acting outside the scope of my representation. The claim as argued is plainly frivolous. If using hyperbole were a basis for liability then no lawyer would be safe from lawsuits by adversaries. Plaintiff also fails to overcome the flaw in

his argument when it is pointed out that the hyperbole did not result in anything since the Plaintiff failed to file an amended Complaint in "Parker I".

With regard to LTSC, in his six sentences on the issue, Plaintiff has failed to come up with anything to justify reconsideration of the Court's decision.

Based on the foregoing, the Court should deny the Plaintiff's Motion for Reconsideration.

The undersigned certifies that on this date, this Opposition to Plaintiff's Motion for Reconsideration was filed electronically by counsel, Matthew S. Wolf, and by mailing a copy via United States Postal Service, first class, postage pre-paid to:

Gordon Roy Parker, *pro se* Plaintiff  
4247 Locust Street, #806  
Philadelphia, PA 19104

Thomas E. Geiger  
817 North McCrary Road  
Columbus, MS 39702-4320

These papers were served electronically upon the University of Pennsylvania through counsel, Dennis G. Young, Esquire, and upon Paul Ross through Counsel, Mary Kay Brown, Esquire. Pursuant to 28 U.S.C. § 1746, I certify under penalty of perjury that the foregoing is true and correct.

Respectfully,

/s/ Matthew S. Wolf

Matthew S. Wolf

April 27, 2006